



Surfrider Foundation

Ventura County Chapter

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February 23, 2011

Karen Waln
Environmental and Water Resources Division
City of Ventura
via email: kwaln@ci.ventura.ca.us

RE: SCRE Special Studies - Feb. 10, 2011 - Meeting

Dear Ms. Waln:

Thanks for the opportunity to formally submit the following comments regarding the SCRE Special Studies:

We are concerned that the representation of Steelhead Habitat is potentially inaccurate and misleading. The habitat comparison table represents a gross estimate of habitat 'quantity' based upon water depth at select estuary stages with the current bathymetry.

Habitat 'quality' is not considered in this assessment, including the potential for improvements in water quality with reduced algae, DO, and other parameters. It is also important to consider the enhancement in habitat quality resulting from the reduced likelihood of artificial unseasonal breaching with reduced estuary stage.

The analysis also misrepresents the fundamentally dynamic nature of a coastal estuary. While we recognize that major flood events completely 're-set' the estuarine ecosystem, a permanent reduction in stage resulting from reduced wastewater discharge could lead to many changes that could potentially enhance steelhead habitat. Such enhancement may occur with vegetation changes such as willow recruitment, which during moderate discharge events from the Santa Clara River could result in scour pools containing overhanging root wads and other cover for steelhead. Because such habitat succession is not possible under the current conditions, a reduction in wastewater discharge could enhance habitat for steelhead in ways not predicted by the simplified analysis presented.

Surfrider concurs with similar comments from HTB and VCK relating to steelhead habitat, and we do not support the use of the current analysis in decision-making regarding future operations at the Ventura Wastewater Treatment Plant.

Sincerely,

A. Paul Jenkin, M.S.
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